

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,
Plaintiff,
vs.

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

DECLARATION OF APRIL ROCKSTEAD BARKER

I, APRIL ROCKSTEAD BARKER, declare under penalty of perjury as follows:

1. I am one of the attorneys for the Plaintiff in the above matter. This Declaration is submitted in support of Plaintiff's motion for partial summary judgment.
2. Attached as Exhibit 1 hereto are true and correct copies of pages from the transcript of the deposition of Moira Demos taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
3. Attached as Exhibit 2 hereto is a true and correct copy of a print-out from the Wisconsin Circuit Court Access Program page for State of Wisconsin v. Steve A. Avery, Manitowoc County Case No. 2005CF000381.
4. Attached as Exhibit 3 hereto are true and correct copies of pages from the transcript of the deposition of Lisa Nishamura taken in the above matter as provided to

- Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
5. Attached as Exhibit 4 hereto are true and correct copies of pages from the transcript of the deposition of Adam Del Deo taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
 6. Attached as Exhibit 5 hereto are true and correct copies of pages from the transcript of the deposition of Moira Demos taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
 7. Attached as Exhibit 6 hereto are true and correct copies of pages from the transcript of the deposition of Adam Del Deo taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
 8. Attached as Exhibit 7 hereto are true and correct copies of pages from the transcript of the Avery criminal trial, Manitowoc County Case No. 2005CF381, for February 20, 2007, as printed from a publicly available source online.
 9. Attached as Exhibit 8 hereto are true and correct copies of pages from the transcript of the deposition of Lisa Nishamura taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
 10. Attached as Exhibit 9 hereto are true and correct copies of portions of Exhibit 7 as marked at the deposition of Lisa Nishamura taken in the above matter, except that

email addresses have been redacted and exhibit page numbers have been added due to the length of the exhibit and because Bates numbers are not sequential within the document.

11. Attached as Exhibit 10 hereto are true and correct copies of pages from the transcript of the deposition of Adam Del Deo taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
12. Attached as Exhibit 11 hereto are true and correct copies of portions of Exhibit 5 as marked at the deposition of Lisa Nishamura, and referenced during the deposition of AdamDel Deo taken in the above matter, except that email addresses have been redacted.
13. Attached as Exhibit 12 hereto are true and correct copies of an email message and a portion of a document containing production notes produced in discovery by Netflix, Inc., in this matter, except that email addresses have been redacted.
14. Attached as Exhibit 13 hereto are true and correct copies of pages from the transcript of the deposition of Moira Demos taken in the above matter as provided to Plaintiff's counsel by the court reporter, with some added identification in marker as to pertinent portions thereof.
15. Attached as Exhibit 14 hereto are true and correct copies of portions of an email thread that was produced in discovery by Chrome Media, LLC, in this matter as CHRM000481-82, except that email addresses and personal contact information have been redacted.

Dated this 16th day of September, 2022.

/s/ April Rockstead Barker
April Rockstead Barker, SBN #1026163